

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A  
BRAZOS LICENSING AND  
DEVELOPMENT,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Case No. 6:21-CV-00128-ADA

JURY TRIAL DEMANDED

**DEFENDANT'S STIPULATION OF INVALIDITY CONTENTIONS**  
**FOR U.S. PATENT NO. 9,357,014**

On May 21, 2021, Defendant Cisco Systems, Inc. (“Defendant”) filed petition No. IPR2021-00961 with the Patent Trial and Appeal Board (“the Board”), requesting *inter partes* review of U.S. Patent No. 9,357,014 (“the ’014 patent”).

The petition asserts two grounds of invalidity:

1. Claims 1–11 and 18–19 of the ’014 patent are anticipated under 35 U.S.C. § 102 by U.S. Patent No. 8,359,397 to Traversat et al. (“Traversat”).
2. Claims 12–17 of the ’014 patent are obvious under 35 U.S.C. § 103 over Traversat in view of U.S. Patent Pub. No. 2005/0015427 to Guo et al. (“Guo”).

In the petition, Defendant stated that “[i]f the Board institutes trial, [Defendant] will cease asserting in the co-pending litigation the combination of references on which trial is instituted for the claims on which trial is instituted, to the extent [Defendant] even asserts the same combination in the district court.”

Defendant hereby memorializes its statement to the Board in this litigation. Defendant stipulates that if the Board institutes *inter partes* review on IPR2021-00961, then Defendant will cease asserting in this litigation the combination of references on which trial is instituted for the claims on which trial is instituted, to the extent Defendant even asserts the same combination in this litigation.

This stipulation is not intended and should not be construed to limit Defendant’s ability to assert invalidity of the claims of the ’014 patent based on any combinations other than those set forth in the petition in IPR2021-00961.

Dated: September 23, 2021

By: /s/ Brian Rosenthal with permission,  
by Michael E. Jones  
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*Attorneys for Defendant Cisco Systems, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 24, 2021, I electronically filed this document with the Clerk of Court via the Court's CM/ECF system which will send notification of such filing to all counsel of record, all of whom have consented to electronic service in this action.

/s/ Michael E. Jones